IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

	221 22 3 42 3 4 5
DAWN THOMPSON,	
Plaintiff,)	
v.)	
MICRON TECHNOLOGY, INC., MICRON SEMICONDUCTOR PRODUCTS, INC., CRUCIAL TECHNOLOGY, INC., NANYA TECHNOLOGY CORPORATION, NANYA TECHNOLOGY CORPORATION USA, INFINEON TECHNOLOGIES AG, INFINEON TECHNOLOGIES NORTH AMERICA CORPORATION, MOSEL VITELIC CORPORATION, MOSEL VITELIC CORPORATION USA, WINBOND ELECTRONICS CORPORATION, WINBOND ELECTRONICS CORPORATION AMERICA, NEC ELECTRONICS AMERICA, INC., HYNIX SEMICONDUCTOR INC., HYNIX SEMICONDUCTOR AMERICA, INC., SAMSUNG ELECTRONICS CO., LTD, SAMSUNG SEMICONDUCTOR, INC., ELPIDA MEMORY, INC., AND ELPIDA MEMORY USA, INC.	04 10778 J. Civil Action No.
))	

CORPORATE DISCLOSURE STATEMENT OF HYNIX SEMICONDUCTOR AMERICA, INC.

Pursuant to Local Rule 7.3, defendant Hynix Semiconductor America, Inc.

("Hynix") hereby discloses the following information:

Parent corporation: Hynix Semiconductor, Inc.

Publicly held companies owning 10% or more of Hynix's stock: None.

James S. Dittmar (BBO #126320)

Christopher T. Holding (BBO #600627)

GOODWIN PROCTER LLP

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Counsel for Hynix Semiconductor Corporation America

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Terrence A. Callan Albert J. Boro, Jr. PILLSBURY WINTHROP LLP 50 Fremont Street San Francisco, CA 94105 (415) 983-1000

Dated: April 16, 2004.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing Corporate Disclosure Statement has been served this 16th day of April, 2004 upon:

Kenneth C. Gilman John Martland GILMAN AND PASTOR, LLP Stonehill Corporate Center 999 Broadway, Suite 500 Saugus, MA 01906

Christopher T. Holding

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